

MIRIAM TAUBER LAW

885 Park Avenue 2A • New York, NY 10075
MiriamTauberLaw@gmail.com • (323) 790-4881

April 25, 2022

Via ECF

Hon. Katherine Polk Failla, U.S.D.J. (S.D.N.Y.)

Re: *Calenture, LLC, et. al., v. Trean Insurance Grpoup, Inc.* No. 22-CV-218 (KPF):

**Notice of Execution of Stipulation of Settlement;
Request for 10-day Extension of Deadline to Re-Open Case**

MEMO ENDORSED

Your Honor:

I am one of Plaintiffs' counsel in the above-referenced case.

Plaintiffs advise the Court that the parties have executed to a Settlement Agreement dated April 22, 2022. The agreement provides 10 business days for the Defendant to complete performance of certain obligations under the Settlement Agreement, upon which applicable releases will take effect. At that time, Plaintiffs intend to voluntarily dismiss this action with prejudice without the need for further action by the Court.

Plaintiffs respectfully request a 10-day extension of the deadline to petition to re-open the case in the event the settlement is not consummated. (See Order, Dkt #11.) The parties expect the settlement to be consummated and the case dismissed on or before **May 5, 2022**.

This is the first request for an extension of the settlement/petition deadline.

Defendant consents to this request.

Respectfully submitted,

s/ *Miriam Tauber*

Miriam Tauber, Attorney for Plaintiffs

cc (via ECF): all counsel

Application GRANTED. The deadline articulated in the Court's Order dated March 24, 2022 (Dkt. #11), is hereby EXTENDED to May 5, 2022. The Clerk of Court is directed to terminate the pending motion at docket number 12.

Dated: April 26, 2022
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE